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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI

Form for Filing a Section 1983 Civil Rights Complaint (by persons not in jail or prison)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
Greenville DIVISION

Glenn Jean Hunter
Quindarius Jamal Rhedell Smith

(Enter above the full name of the Plaintiff[s]
in this action.)

-vs-

Case No 4:20-CV-010-MPM-JMV
(To be assigned by Clerk)

City of Greenville, MS Julian Phillips
Enrick D. Simmons JAMES EVANS
Daniel Vaxton Isagani Thomas
STEVEN TORREY

(Enter above the full name of ALL Defendant[s]
in this action. Fed. R. Civ. P. 10(a) requires that
the caption of the complaint include the names of
all the parties. Merely listing one party and "et al"
is insufficient.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C. §1983
(by persons not in jail or prison)

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. If more than one plaintiff, attach an additional sheet that provides each plaintiff's name and address.)

A. Name of Plaintiff: Glenn Jean Hunter
Address: 1020 Goethe Street Greenville, MS 38901

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of an additional

defendants.)

B. Defendant, Errick D. Simmons, is employed as Mayor at City of Greenville, MS.

C. Additional Defendants:

City of Greenville, MS is a political subdivision of the State of Mississippi
Daniel Jackson is employed as a police officer with the City of Greenville Police Dept.
Steven Torrey is employed as a police officer with the City of Greenville Police Dept.
Julian Phillips is employed as a police officer with the City of Greenville Police Dept.
James Evans is employed as a police officer with the City of Greenville Police Dept.
Adoni Thomas is employed as a police officer with the City of Greenville Police Dept.

IV. Statement of Claim

State here as briefly as possible the facts of your case, that is, what happened that caused you to file this complaint. Describe how each defendant is involved. Include also dates and places where the complained of events occurred. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

- ① On January 1, 2017 at around 8:30 p.m. Ronnie Monter was at his aunt's house on Goethal Street in Greenville, MS. one of his friends was on flat at his Mom's house. Hong Shorter, one of Ronnie's cousins agreed to drive him home to 309 NE 77 Street Greenville, MS.
- ② Around 8:30 p.m. Officer James Evans & Officer Steven Torrey responded to an anonymous complaint that shots were being fired on NE 77 Street. When they arrived they didn't see or hear anything.
- ③ Around 8:50 p.m. Ronnie's cousin dropped him off at home. They didn't see any policemen or anyone else on the street. As Ronnie's cousin drove off he stopped at the corner of NE 77 Street and Canal Ave. He saw Ronnie fire two gunshots in the air. He also saw the screen door slam and he saw the front porch light come on. Then he left.

V. State the names of witnesses who would testify for you or on your behalf, and state **briefly** what they would say.

WITNESS'S NAME

WHAT THIS WITNESS WOULD SAY

Michael Johnson

Explaining Coroner's report

Michael Gooden

What Ronnie did when he arrived at his home.

VI. Name all **documents** that you know of which would support your claim and state **briefly** what each document says or shows.

DOCUMENT

WHAT THE DOCUMENT SAYS OR SHOWS

Incident Report

Coroner's report

Greenville Police dept description of what happened
Manner of Kennie's death.

VII. Explain how you were injured (incurred medical costs, incurred physical injury and/or emotional distress, etc.)

Emotional distress, fear, lost of economic benefits, lost of faith in
society, lost of faith in police officers.

VIII. Relief

State briefly exactly what you want the court to do for you.

Award the plaintiff \$11 million dollars

IX. Jury Demand

I would like to have my case tried by a jury.

☒ Yes

☐ No

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of our information, knowledge, and belief.

Signed this 20 day of January, 2020.

Flora J. Shorter
Juan Luis Smir

(Signature of Plaintiff/Plaintiffs)

Name of Plaintiff: Quindarius Jamal Rhodell Smith
Address: 1070 Goethal Street Greenville, MS 38901

- ④ Around 8:50 p.m. the Greenville police department received second complaint of shots being fired again. And, then officers James Evans, Darnell Saxton, Steven Conner, Julian Phillips, Tabari Thomas arrived in the neighborhood. When they arrived in the neighborhood they parked their patrol cars on another street and walked to NE 77 Street.
- ⑤ The caller that called in told them to go specifically to 309 NE 77 Street. Shortly, before 9 p.m. Ronnie Shorter called his mom to let her know he had made it home safely. While he was on the phone with his mom Flora Shorter he told her someone was knocking on the door. And, he hung up the phone quickly to see who it was.
- ⑥ Upon information and belief two officers were at the door and three officers were at the back yard area. The officers shot him four times at the door. And multiple shots to the front of the house. He dropped the gun at the front of the house. And, he ran to the street and the officers shot him seven more times to his back, and he fell face down.
- ⑦ No one has reached out to the family to inform the family what happened. The family has heard through news and social media what allegedly supposed to happen. Greenville Police Department, FBI, DA's office hasn't reached out to the family, and it's been three years.
- ⑧ The family reached out to an attorney who accepted the case and was supposed to pursue the case. However, the family have not heard from the lawyer in 18 months. The family has been misled by this lawyer. The lawyer name is Brandon Connerly of Jackson, Mo. He will not return phone calls, emails, or texts.

(9) The defendants are in violation of the Fourth and Fourteenth Amendment of the United States Constitution under 42 U.S.C. § 1983. The defendants un-reasonably seized Mr. Horton and used excessive force, as a direct result of the defendant's action the plaintiffs have been injured.

(10) The City of Greenville is liable to the plaintiffs under 42 U.S.C. § 1983. Because the violation of Ronnie's rights was caused by a policy practice or custom of the City of Greenville police Department. They include the Greenville Police Department lack of policy and training on fatal use of force, policy of not following the Mississippi public record policy and the custom policy or practice of violating the Fourth Amendment through un-reasonably killing of a citizen. The City of Greenville fail to train, supervise, and discipline Greenville Police Department officers including the remaining defendants.

(11) The plaintiffs family members visited the Greenville Police Department to get copies of the policy on fatal use of force and Officer Melvin Netter said the Department would not follow the public records law. We requested the policy multiple times from the City of Greenville attorney. And have yet to receive a copy.